REMARKS/ARGUMENTS

The office action of January 27, 2005 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1-8 and 11-32 remain in this application. Claims 9 and 10 were previously canceled.

Minor claim amendments have been made to improve the clarity of the invention.

Claims 7-8, 11-26 and 29-32 stand rejected under 35 U.S.C. § 101 because the claimed invention is directed to non-statutory subject matter. Applicant have amended claim 7 to recite that the software package for editing Web-based documents is "stored on one or more computer readable media". Applicants submit that claim 7 as amended and claim 8, 11, 12 and 29-32, which ultimately depend from claim 7, are now clearly statutory subject matter. Claims 13-26 are method as opposed to apparatus claims like claim 7 and its dependent claims. As such, these claims clearly constitute a "process" within the scope of statutory subject matter defined by section 101. Also for clarity purposes, claim 13 has been amended to recite "computer-implemented method". Accordingly, withdrawal of these rejections is requested.

Claims 1-2, 5-6, 11-12 and 27-28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Matthews et al., "Complete Reference FrontPage 2000," Public Release 1999 by Osborn/McGraw-Hill, CA ("Matthews") in view of U.S. patent no. 6,101,509 to Hanson et al. ("Hanson") and claims 3-4, 13-26 and 29-32 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Matthews in view of U.S. patent publication no. 2002/0004813A1 to Agrawal et al. ("Agrawal"). Applicants respectfully traverse these rejections.

Claims 1-2, 5-6, 11-12 and 27-28

The action alleges that Matthews discloses a method for editing Web-based documents including receiving from a user an indication of a selected portion of a Web-based document to be edited and an indication of a desired editing function to be performed on the selected portion as recited claim 1. However, the action acknowledges that Matthews a teaching or suggestion of the claim 1 features of 1) inserting immediately prior to the selected portion a first editing tag corresponding to the desired editing function; 2) detecting object tag elements within the selected portion; 3) inserting immediately prior to each object tag element within the selected portion a

second editing tag corresponding to the desired editing function and inserting the second editing tag at the end of the selected portion; and 4) inserting immediately after each object tag element within the selected portion the first editing tag, wherein the first and second editing tags are distinguishable from the object tag elements. To overcome these deficiencies, the action relies on col. 1, line 15 to col. 2, line 15 of the Background of the Invention section of Hanson.

The portion of Hanson identified by the action describes creating and editing an HTML formatted Web document using a text editor software application. Hanson discloses that a user can embed HTML "tags", which are typically paired, in the Web-based documents at appropriate locations to inform a Web browser how to display the various types of content in the document. At col. 2, lines 5-10, Hanson further states that:

> Tag-based editors, also known as HTML editors, were developed to provide HTML extensions. The HTML extensions allow a user to edit a document, select a segment of the document and choose an appropriate HTML tag from a pull down menu or the like to insert the HTML tags around the selected segment of the document. This obviates the need for a user to learn the specific keystroke sequences representing a given pair of HTML tags.

The action, after describing the features of Hanson just discussed, concludes that the cited portion of Hanson discloses all the features of claim 1 absent from Matthews. While Hanson describes a user inserting HTML tags at the appropriate locations in a Web document, Hanson does not describe how those appropriate locations are determined in the tab-based editors referenced at col. 2, line 5. As such, Hanson lacks a teaching or suggestion of detecting object tag elements within the selected portion; inserting immediately prior to each object tag element within the selected portion a second editing tag corresponding to the desired editing function and inserting the second editing tag at the end of the selected portion; and inserting immediately after each object tag element within the selected portion the first editing tag, wherein the first and second editing tags are distinguishable from the object tag elements.

For at least this reason, the combination of Matthews and Hanson, even if proper, does not result in the claim 1 invention. For substantially the same reasons, independent claim 7, which calls for an object tag detecting module and an insertion module, is patentably distinct from Matthews and Hanson.

Claims 2, 5, 6, 11, 12, 27 and 28, which depend from claim 1 or claim 7, are allowable over the applied art for the same reasons as their ultimate base claim, and further in view of the additional advantageous features recited therein. For example, claim 5 (see also claim 11, which is similar) recites that when an object tag element closing a first function is found within the selected portion of the Web-based document without a corresponding object tag element opening the first function, the method includes inserting a third editing tag closing the first function immediately prior to the first editing tag immediately before the selected portion; and inserting a fourth editing tag opening the first function immediately after the first editing tag immediately before the selected portion. The combination of Matthews and Hanson is wholly devoid of any teaching or suggestion as to such a scenario.

Matthews and Hanson also fail to even contemplate the features of claims 6 and 12. For example, claim 12 recites that when an object tag element opening a first function is found within the selected portion of the Web-based document without a corresponding object tag element closing the first function, the insertion module inserts an editing tag opening the first function immediately after the editing tag immediately after the selected portion, and inserts an editing tag closing the first function immediately before each object tag element within the selected portion after the object tag element opening the first function and inserts an editing tag reopening the first function immediately after each object tag element within the selected portion after the object tag element opening the first function.

Claims 3-4, 13-26 and 29-32

The action rejects claims 3-4, 13-26 and 29-32 over the combination of Matthews and Agrawal.

1. Claims 3, 4 and 29-32

Claims 3, 4 and 29-32, ultimately depend from one of claims 1 and 7. As acknowledged by the action, Matthews does not teach or suggest all the elements of claims 1 and 7. Agrawal is directed to caching pages of dynamically generated content and provides no teaching or suggestion of the claim 1 features of 1) inserting immediately prior to the selected portion a first editing tag corresponding to the desired editing function; 2) detecting object tag elements within the selected portion; 3) inserting immediately prior to each object tag element within the selected

portion a second editing tag corresponding to the desired editing function and inserting the second editing tag at the end of the selected portion; and 4) inserting immediately after each object tag element within the selected portion the first editing tag, wherein the first and second editing tags are distinguishable from the object tag elements. Indeed, the action has failed to identify any correspondence between these features of claim 1 and Agrawal. Hence, notwithstanding whether Agrawal discloses saving, detecting and inserting as particularly recited in claim 3, Agrawal does not remedy the deficiencies of Matthews with respect to the features of claim 1, which are incorporated by reference into claim 3. Similarly, claim 4 incorporates the features of claim 1. Also, claim 7 is similar to claim 1 and claims 29-32 incorporate the features of claim 7. For at least these reasons, the combination of Matthews and Agrawal does not result in the inventions of claims 3, 4, and 29-32.

Applicants note that the action may have intended to combine Agrawal with the Matthews and Hanson. Nonetheless, Agrawal does not remedy the defects of Matthews and Hanson as discussed with respect to claim 1.

Moreover, even assuming, but not admitting that Hanson or the combination of Matthews and Hanson discloses all the elements of claim 3, but the steps of saving and reinserting. Agrawal does not even overcome this deficiency.

Amended claim 3 calls for, among other features, saving a portion of the Web-based document including the first and second editing tags; and reinserting the first and second editing tags into the Web-based document where the first and second editing tags were inserted prior to being saved in response to a reassembly request. Agrawal discloses partial page caching of blocks A, B, C and D of a Web page 202. *See* Fig. 2. A copy of each block is stored in cached memory and the page may be assembled from blocks retrieved from the cache memory. Admittedly, Agrawal discloses caching portions of a Web document. However, Agrawal does not contemplate reinserting the first and second editing tags into the Web-based document where the first and second editing tags were inserted prior to being saved. Most notably, the blocks of Agrawal are disparate contextual portions of the document, and it is these contextual blocks which are reassembled to form the Web-based document content. In stark contrast, claim 3 calls for reinserting the first and second editing tags into the Web-based document. Namely, the Web-

based document content exists and claim 3 calls for reinserting the editing tags into the appropriate portion of the document. As such, even if proper, neither the combination of Hanson and Agrawal nor the combination of Matthews, Hanson, and Agrawal results in the claim 3 invention. To the extent claim 29 is similar to claim 3, it also distinguishes from the combinations including Agrawal. Claim 30, which depends from claim 29, is considered distinguishable for the same reasons as claim 29 and further in view of the recitation that the portion of the Web-based document including the editing tags includes contextual data, the contextual data aiding in identifying where editing tags were inserted prior to being saved. Notably, the contextual data in claim 30 aids in identifying where the editing tags were inserted prior to being saved. Since no document exists with Agrawal until the blocks are assembled, no contextual data is need to identify where the editing tags were inserted for reinserting,

Claims 4, 31 and 32 are also patentably distinct from the combinations including Agrawal. Regarding claim 4, contrary to the assertion in the action, Agrawal does not teach or suggest at least the claimed steps of detecting that the portion of the Web-based document where the first and second editing tags were located prior to the step of saving has been moved to a new location within the Web-based document; and inserting the first and second editing tags at the new location within the Web-based document in the same relative position within the portion of the Web-based document where the first and second editing tags were inserted prior to being saved. Claim 31 and claim 32, which depends from claim 31, are also similarly distinguishable. Also, claim 32 includes a recitation similar to the recitation in claim 30 and is also distinguishable for this further reason.

2. Claims 13-26

The action rejects claim 13 stating that claim 13 "incorporate substantially similar subject matter as cited in dependent claim 1 and 3" and is similarly rejected. Applicants respectfully disagree with the characterization that claim 13 is similar to claim 3. As such, any rejection of claim 13 would be based on similar rationale as claim 1 above.

In any event, none of Matthews, Hanson or Agrawal alone or in combination teaches or suggests A computer implemented method including scanning a selected portion of a Web-based document for embedded tags, and inserting into the selected portion of the Web-based document

editing tags based on the embedded tags and a desired editing operation, wherein the editing tags are distinguishable from the embedded tags. Should the rejection of claim 13 be maintained, applicants respectfully request that the action identify where in the applied art the claimed features are shown. Claims 14-26, which ultimately depend from claim 13, are patentably distinct from the cited art for the same reasons as claim 13, and further in view of the features recited therein.

For example, claim 16 calls for storing the editing tags and context portions of the Web-based document associated with the editing tags; and reinserting the editing tags into the Web-based document based on the context portions. As similarly discussed to some extent with respect to claims 3, 4, and 29-32, applicants submit that none of the references discloses *reinserting* the editing tags *into the Web-based document* based on the context portions. Necessarily, the applied art does not teach that the context portions of the Web-based documents include portions of the Web-based document immediately prior to and after where the editing tags were inserted into the Web-based document as recited in claim 17.

Nowhere does the applied art teach or suggest storing the editing tags and context portions of the Web-based document associated with the editing tags in a file including *data identifying a view* as recited in claims 18 and 20, and also the claim 20 steps of receiving a user selection identifying a file including data identifying a view; and redefining the editing tags to include the view prior to the step of reinserting the editing tags. Moreover, the applied art is wholly devoid of a teaching or suggestion that reinserting includes *searching the Web-based document for the context portions* and *inserting the editing tags within corresponding context portions* of the Web-based document as recited in claim 21 or that the context portions of the Web-based document have changed location prior to the step of reinserting as called for in claim 22. Furthermore, the applied art lacks a teaching or suggestion of both scanning the selected portion of the Web-based document for previously added edit tags, wherein if the previously added edit tag corresponds to the desired editing operation then inserting a group editing tag next to the previously added edit tag as recited in claim 24 and assigning the editing tags a first custom order attribute; repeating the steps of scanning and inserting for a second set of editing

tags; and assigning the second set of editing tags a second custom order attribute higher than the first custom order attribute as recited in claim 25.

CONCLUSION

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,

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